

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,**  
Plaintiff.

**CRIMINAL NO. 25-003 (CVR)**

v.

**JESÚS MANUEL ARIAS-LARA,**  
**a.k.a. Bryan Mension, Henry Ramirez-Ortiz, and**  
**Daniel Reyes,**  
Defendant.

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**UNITED STATES' SENTENCING MEMORANDUM**

**TO THE HONORABLE COURT:**

COMES NOW, the United States of America, through its undersigned counsel, and respectfully submits its position as to the sentence that should be imposed on Defendant Jesús Manuel Arias-Lara at the sentencing hearing.

**BACKGROUND**

On December 23, 2024, at the Luis Muñoz Marín Airport in Carolina, Puerto Rico, the Defendant attempted to board a flight bound to New Jersey. *See* ECF No. 1-1 at 1. He purported to be a U.S. citizen, presenting as proof of identity a Pennsylvania Driver's license under the name of "Bryan Mension." *Id.* An immigration inspection was conducted which revealed the Defendant is a national and citizen of the Dominican Republic with no legal authority to be present in the United States.

In addition, the Defendant was previously removed from the United States on March 17, 2015, after having been convicted of improper entry to the United States, in violation of 8 U.S.C. § 1325, in the Federal District Court for the Southern District of Texas, criminal case no. 5:15-po-

68-1. *See* ECF No. 23 at 9.

The instant criminal proceedings ensued.

On March 24, 2025, the Defendant pled guilty to the sole Count of the Indictment pursuant to a straight plea. He was charged with illegal reentry after removal, in violation of 8 U.S.C. § 1326(a). For the reasons set forth below, and after due consideration of the relevant factors enumerated in 18 U.S.C. § 3553(a), the United States will recommend that the Defendant be sentenced to a term of four (4) months of imprisonment, to be followed by a term of supervised release of one (1) year.

### **SENTENCING CONSIDERATIONS**

The United States agrees with the U.S. Probation Office in calculating the Defendant has a Criminal History Category of II, which along with a Total Offense Level of 6, yields a guidelines imprisonment range of one (1) to seven (7) months of imprisonment. Presentence Investigation Report, ECF No. 23 at 12.

### **SENTENCE RECOMMENDATION**

The United States requests that the Defendant be sentenced to a term of four (4) months of imprisonment, to be followed by a term of supervised release of one (1) year. This sentence is sufficient, but not greater than necessary when considering the defendant's history and characteristics, the nature and circumstances of this offense, as well as the remaining 3553 factors.

For starters, when encountered by federal law enforcement on December 23, 2024, the Defendant purported to be a U.S. citizen named "Bryan Mension." The United States could have pursued an additional charge for falsely claiming to be a U.S. citizen, in violation 18 U.S.C. § 911, and it exercised its discretion not to do so.

This was not his first time. The Defendant has used multiple aliases in the past, such as

“Daniel Reyes”, “Abner Gutierrez”, “Octavio Olivero”, and “Henry Ramirez-Ortiz”. *See* the Presentence Investigation Report, ECF No. 23 at 7-9. He has had multiple brushes with the law and, although only the 2015 improper entry conviction counts towards his criminal history, the fact that he recently attempted to impersonate a U.S. citizen, goes to show the seriousness of the instant offense and the lack of respect for the law.

Accordingly, the United States respectfully submits that a sentence of four (4) months of imprisonment—which is at the mid-range of the applicable guidelines—is reasonable and just. In addition, a one (1)-year term of supervised release will help ensure proper deterrence from future criminal activity.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 25<sup>th</sup> day of April, 2025.

W. STEPHEN MULDROW  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this same date a true and exact copy of the foregoing motion has been filed with the Clerk of the Court who would notify to the attorneys of record in this case.

/s/ Steven Liong-Rodríguez  
**Steven Liong-Rodríguez**  
Special Assistant U.S. Attorney